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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KELLY CARROLL, Individually and On Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, and WELLS
FARGO BANK, N.A.,

Defendants.

Case No. 3:15-CV-02321-EMC

**STIPULATION CONCERNING
DEADLINE FOR MEDIATION,
CLASS CERTIFICATION MOTION
AND HEARING AND FURTHER
CASE MANAGEMENT
CONFERENCE**

Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, Plaintiff Kelly Carroll (“Plaintiff”) and Defendants Wells Fargo & Co. and Wells Fargo Bank, N.A. (“Defendants” or “Wells Fargo”) hereby stipulate as follows:

1 WHEREAS, during the January 14, 2016 hearing in this matter, the Honorable Court
2 ordered the parties in the above-referenced matter to mediation within 90 days of January 14,
3 2016, or by April 13, 2016.

4 WHEREAS, in the Court's minute entry, the Court set certain other deadlines and
5 hearings that the parties understood were determined in part based on the mediation deadline,
6 since the parties and the Court discussed the desire to limit discovery costs to the extent the case
7 could be settled.

8
9 WHEREAS, the parties have worked diligently to agree to a mediator and set a mediation
10 date. The parties have agreed, subject to the Court approving the extension of the mediation
11 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,
12 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

13
14 WHEREAS, the parties have agreed to the stipulated dates herein, subject to approval of
15 the Court.

16 THEREFORE, THE PARTIES AGREE AND STIPULATE TO THE FOLLOWING
17 subject to approval by the Court:

- 18 1. The parties' are Ordered to mediate this matter by June 30, 2016.
- 19 2. The deadline for Plaintiff to file her Motion for Class Certification is extended to
20 August 31, 2016.
- 21 3. Defendants' Opposition to Plaintiff's Motion for Class Certification is due September
22 30, 2016.
- 23 4. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class
24 Certification is due October 19, 2016.
- 25 5. The Further Case Management Conference is rescheduled from October 6, 2016 to
26 November 17, 2016 at 1:30 PM in Courtroom 5, 17th Floor, San Francisco.
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6. The Motion for Class Certification Hearing is rescheduled from October 6, 2016 to November 17, 2016 at 1:30 PM in Courtroom 5, 17th Floor, San Francisco.

7. The deadline for filing of the Further Case Management Statement is extended from September 29, 2016 to November 10, 2016.

Pursuant to Local Rule 6-2, there have been no other time modifications on the motion that is the subject of this Stipulation, and it is not anticipated that this extension will affect the schedule for the case. Also pursuant to Local Rule 6-2, the declaration of Rhonda H. Wills is attached as Exhibit A to the Stipulation.

IT IS SO STIPULATED.

Dated: March 4, 2016

By: /s/ Rhonda H. Wills
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Dated: March 4, 2016

By: /s/ Timothy M. Watson
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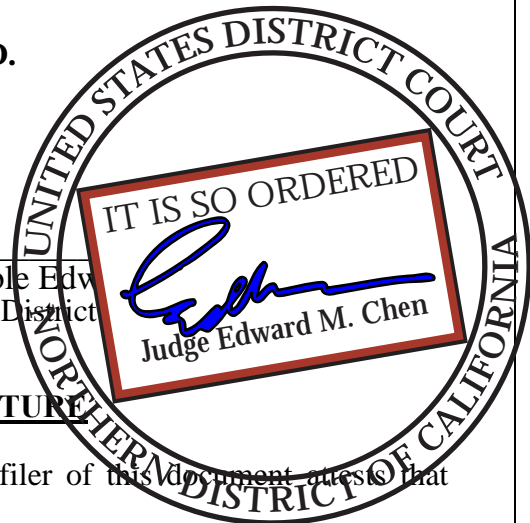
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3 / 4, 2016

The Honorable Edw
United States District



ATTESTATION OF SIGNATURE

Pursuant to Civil Local Rules 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: March 4, 2016

By: /s/ Rhonda H. Wills
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9 ATTORNEYS FOR PLAINTIFF
10 AND THE PUTATIVE CLASSES

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KELLY CARROLL, Individually and On Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, and WELLS
FARGO BANK, N.A.,

Defendants.

Case No. 3:15-CV-02321-EMC

**DECLARATION OF RHONDA H.
WILLS IN SUPPORT OF
STIPULATION CONCERNING
DEADLINE FOR MEDIATION,
CLASS CERTIFICATION MOTION
AND HEARING AND FURTHER
CASE MANAGEMENT
CONFERENCE**

1 I, Rhonda H. Wills, declare as follows:

2 1. I am managing partner of Wills Law Firm, PLLC, one of the firms serving as
3 Plaintiff's counsel herein. I make these statements based on personal knowledge and would so
4 testify if called as a witness.

5 2. This Declaration is submitted in support of the Parties' Stipulation Concerning
6 Deadline for Mediation, Class Certification Motion and Hearing and Further Case Management
7 Conference.

8 3. During the January 14, 2016 hearing in this matter, the Honorable Court ordered
9 the parties in the above-referenced matter to mediation within 90 days of January 14, 2016, or by
10 April 13, 2016. In the Court's minute entry, the Court set certain other deadlines and hearings
11 that Plaintiff's counsel understood were determined in part based on the mediation deadline,
12 since the parties and the Court discussed the desire to limit discovery costs to the extent the case
13 could be settled.

14 4. The parties have worked diligently to agree to a mediator and set a mediation
15 date. The parties have agreed, subject to the Court approving the extension of the mediation
16 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,
17 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

18 5. Therefore, the parties have agreed and stipulated to the following subject to
19 approval by the Court:

- 20 a. Mediation to occur June 30, 2016.
- 21 b. Plaintiffs to file their Motion for Class Certification by August 31, 2016.
- 22 c. Defendants' Opposition to Plaintiff's Motion for Class Certification is due
23 September 30, 2016.
- 24 d. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class
25 Certification is due October 19, 2016.
- 26 e. Further case Management Conference on November 17, 2016 at 1:30 PM
27 in Courtroom 5, 17th Floor, San Francisco.
- 28

f. Motion for Class Certification Hearing on November 17, 2016 at 1:30 PM
in Courtroom 5, 17th Floor, San Francisco.

g. Deadline for filing of the Further Case Management Statement is
November 10, 2016.

6. Pursuant to Local Rule 6-2, there have been no other time modifications on the
motion that is the subject of the Parties' Stipulation, and it is not anticipated that this extension
will affect the schedule for the case.

* * *

I declare under penalty of perjury under the laws of the United States and the State of
California that the foregoing is true and correct. Executed this 4 day of March, 2016,
at Houston, Texas.

w/p Rhonda H. Wills
Rhonda H. Wills